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March 31, 2022

VIA ECF

Hon. Gregory H. Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Chin v. KE Holdings Inc. et al.*,
Civil Action No. 1:21-cv-11196-GHW

Dear Judge Woods:

We represent lead plaintiff Saskatchewan Healthcare Employees' Pension Plan (the "Pension Plan" or "Lead Plaintiff") in the above-captioned action and write to respectfully request relief from the Court's Order dated January 3, 2022, which set an initial pretrial conference for April 11, 2022, and directed the parties to file a joint letter and proposed case management plan on or before April 4, 2022. ECF No. 8.

On March 29, 2022, the Court issued an Order appointing the Pension Plan as Lead Plaintiff and approving its selection of Robbins Geller Rudman & Dowd LLP as Lead Counsel pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. §78u-4 *et. seq.*, which governs this securities fraud case.

Lead Plaintiff anticipates filing an amended complaint, and further anticipates that defendants will move to dismiss the amended complaint – as is routine in securities cases – thereby invoking the PSLRA's automatic discovery stay. *See* 15 U.S.C. §78u-4(b)(3)(B) ("all discovery and other proceedings shall be stayed during the pendency of any motion to dismiss, unless the court finds upon the motion of any party that particularized discovery is necessary to preserve evidence or to prevent undue prejudice to that party").

Therefore, we respectfully submit that it would be premature for the parties to submit a joint letter and proposed case management plan, or to appear for an initial pretrial conference, at this time. We respectfully request that the Court vacate the January 3, 2022 Order, or in the alternative, grant the parties relief from the deadlines set forth in the Order.

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We have conferred with counsel for KE Holdings Inc., who join in this request. In addition, the parties intend to promptly submit a proposed schedule for the filing of an amended complaint and motion to dismiss briefing for the Court's consideration.

We thank the Court for its attention to this matter and are available to answer any questions or concerns the Court may have.

Respectfully submitted,




Erin W. Boardman

Lead Plaintiff's request to adjourn the initial pre-trial conference and deadlines for the submission of the parties' joint status letter and proposed cases management plan and scheduling order is granted. Those deadlines are adjourned sine die. The Clerk of Court is instructed to terminate the motion at Dkt. No. 39.

SO ORDERED.

Dated: April 1, 2022
New York, New York



GREGORY H. WOODS
United States District Judge